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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AIRTECH INTERNATIONAL INC.,

Plaintiff,

v.

BYUNG CHAN YIM A/K/A ROY YIM,
et.al.,

Defendants.

Civil Action No. 22-00668-JXN-AME

**DECLARATION OF
KENNETH K. CHO, ESQ. IN
SUPPORT OF PLAINTIFF'S MOTION
TO AMEND AND SUPPLEMENT THE
FIRST AMENDED AND
SUPPLEMENTAL COMPLAINT, AND
TO JOIN ADDITIONAL PARTIES
DEFENDANT**

FILED UNDER SEAL

I, Kenneth K. Cho, being of full age, hereby declares as follows:

1. I am an attorney admitted to practice before the Courts of the State of New Jersey and of this Court and a member of the law firm of Cho Law Group, LLC, attorneys for plaintiff, AIRTECH INTERNATIONAL INC. ("Airtech"), in the above-titled action and am familiar with the facts and circumstances stated herein.

2. I submit this declaration based upon my personal knowledge and documents referenced herein in support of Plaintiff's Motion to Amend and Supplement the first Verified Amended and Supplemental Complaint and to Join Additional Parties Defendant.

3. Pursuant to Local Civil Rule 15.1, a copy of the proposed amended pleading, named “Verified Second Amended and Supplemental Complaint” (hereinafter “VSASC”), is annexed hereto as **Exhibit A**, and a redlined version of the proposed VSASC compared against the current operative pleading, the Verified Amended Supplemental Complaint (DE 97, hereinafter “VASC”), is attached as **Exhibit B**.

4. True and accurate copies of pages 80, 120-124 and 126-128 of the January 29, 2024 preliminary injunction hearing transcript are attached as **Exhibit C**.

5. True and accurate copies of pages 345-347 of the February 5, 2024 preliminary injunction hearing transcript are attached as **Exhibit D**.

6. A true and accurate copy of an environmental control unit drawing bearing Bates number D_Gmail012751 and produced by Defendants is attached as **Exhibit E**.

7. A true and accurate copy of a Commercial Invoice from Honeywell dated June 24, 2020 bearing Bates number D_Gmail000069-70 and produced by Defendants is attached as **Exhibit F**.

8. A true and accurate copy of a Freight / Airway Bill dated November 1, 2018 bearing Bates number D_Gmail000081 and produced by Defendants is attached as **Exhibit G**.

9. A true and accurate copy of a Ball Thrust Bearing Inspection Report dated May 16, 2013 bearing Bates numbers D_Gmail000212-18 and produced by Defendants is attached as **Exhibit H**.

10. A true and accurate copy of an Air Rover, Inc. Certificate of Conformance dated March 19, 2015 bearing Bates numbers D_Gmail001315-16 and produced by Defendants is attached as **Exhibit I**.

11. A true and accurate copy of a Shinhan Bank Certificate of Remittance from SNT Motiv, a Protected Company listed in the TRO, dated December 29, 2014 bearing Bates number D_Gmail000858 was produced by Defendants and is attached as **Exhibit J**.

12. A true and accurate copy of a November 15, 2022 email from Byungchan Yim's Hans Aerospace email account at r.yim@hansaerospace.com to his personal email at ROY0526YIM@gmail.com with an attachment, filename "MOM_ADD_HTC_Airtech_10-11-2016.docx" and bearing Bates numbers D_Gmail015373-75 was produced by Defendants and is attached as **Exhibit K**.

13. A true and accurate copy of a November 5, 2021 email from Esther Kim at Airtech to Bong June Kim, Esq. with copies to Mr. Jin Lee and Daniel Chun of Airtech, and others at Airtech's prior law firm, and attachment which were automatically forwarded to Byungchan Yim's Gmail account at airtechuscom@gmail.com are attached as **Exhibit L**.

14. A true and accurate copy of New Jersey Business Entity Status Report dated July 23, 2024 directed to HANS AEROSPACE INC. is attached as **Exhibit M**.

15. A true and accurate copy of a U.S. Income Tax Return for an S Corporation, Form 1120-S, and select schedules for HANS AEROSPACE LLC bearing bates numbers YIM007495-7509 was produced by Defendants' counsel and are attached as **Exhibit N**.

16. Pursuant to Local Civil Rule 15.1, counsel for Airtech sent to counsel for Defendants the proposed Verified Second Amended and Supplemental Complaint on November 4, 2024 in the redlined format as the proposed VSASC appears in **Exhibit B**

hereto and requested by transmittal letter thereof that Defendants consent to the filing of the VSASC. On November 11, 2024, Defendants' counsel emailed Airtech's counsel that they did not have authority to consent to the proposed VSASC.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on November 21, 2024.

/s/ Kenneth K. Cho

Kenneth K. Cho, Esq.